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7	UNITED STATES DISTRICT COURT
8	NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION
9	OARLAND DIVISION
10	BRANDON BANKS, ERIN BANKS, and DAVID SOLOWAY, individually and on
11	behalf of those similarly situated,
12	Plaintiffs, DECLARATION OF JENNY CUDWORTH RE: CLAIM SUBMISSIONS
13	v. (
14	NISSAN NORTH AMERICA, INC.,
15	Defendant.
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17	I, JENNY CUDWORTH, declare:
18	1. I am a Senior Consultant at Kurtzman Carson Consultants LLC ("KCC"), located at
19	75 Rowland Way, Suite 250, Novato, California. I am over 21 years of age and am not a party to this
20	action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and
21	would testify competently thereto.
22	2. This declaration supplements the declaration executed by Lacey Racines on May 1, 2015
23	and provides the Court with the current status of the claims submitted under the Banks v. Nissan North
24	America, Inc. class action settlement.
25	3. In accordance with the Court's order and notice plan, KCC sent individual notice to all
26	class members via First Class Mail. The total cost of notice and settlement administration through
27	September 30, 2015 is \$542,508.14.
28	4. As of the date of this declaration, 2,100 claimants submitted unique claim forms to KCC

DECLARATION OF JENNY CUDWORTH RE: CLAIM SUBMISSIONS

- 5. No claims were denied based on the absence of a diagnostic code on the claim submission.
 - 6. KCC has determined that 1,540 claims are valid and approved for reimbursement.
- 7. Of the 1,540 valid claims, the payout ranges are as follows: 194 claims under 48,000 miles for a total value of \$111,479.26; 131 claims between 48,000-60,000 miles for a total value of \$53,469.78; 320 claims between 60,000-80,000 miles for a total value of \$48,562.04; 334 claims between 80,000-100,000 miles for a total value of \$46,234.52; 241 claims between 100,000-120,000 miles for a total value of \$11,810.81; and 320 claims over 120,000 miles for a total value of \$6,500.00. The total value of the valid claims submitted is \$278,056.41. The average claim reimbursement value is \$180.56.
- 8. On August 21, 2015, KCC sent missing information letters to claimants who failed to provide information necessary to determine the validity of their claim. KCC analyzed information received in response to the missing information letters. The claims that were determined to be valid after receiving additional information are included in paragraph 7. 494 claims were determined to be invalid. For each of these invalid claims, the claimant failed to provide any supporting documentation of a brake booster repair, even after KCC mailed a missing information letter to each such claimant seeking this information.
- 9. Subsequently, KCC received 66 new claims lacking the information necessary to determine the validity of these claims. These 66 claims (two of which refer to multiple vehicles) are pending a final status because KCC has mailed missing information letters to these claimants, providing each of these claimants the opportunity to cure. None of these claims will be denied based on the absence of a diagnostic code on the claim submission.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this day of October, 2015 at Novato, California.

JENNY, JUDWORTH